

RICK WARREN
COURT CLERK

59 _____

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.

FACUAL BACKGROUND

9. No response necessary.

10. Admitted.

11. Admitted.

12. Admitted.

13. Admitted.

14. Epic is without sufficient information or knowledge to either admit or deny the allegations in Paragraph 14 and therefore denies same. In further response, Epic states that no public funds received by the school for students enrolled in the school were paid to either any private school or to any student (or parent / guardian of any student).

15. Admitted.

16. Admitted.

17. Admitted.

18. Admitted.

19. Admitted. To further clarify, Epic originally took the position that the paragraph at issue did not prohibit students from being enrolled in Epic as a public school and another educational program. However, Epic was advised by representatives of its sponsor, the Statewide Virtual Charter School Board, that they disagreed in April 2019. So, Epic implemented a protocol to prohibit students to enroll in Epic that were enrolled in a private school and Epic has been vetting previously enrolled students in Epic that are dual enrolled. Once these students are identified, Epic has provided parents with a reasonable period of time to decide between Epic and the private institution. If the parent opts to stay in the private school, Epic is disenrolling the student even though the student resides in the State of Oklahoma.

20. Admitted. To further clarify, Epic originally took the position that the paragraph at issue did not prohibit students from being enrolled in Epic as a public school and another educational program. However, Epic was advised by representatives of its sponsor, the Statewide Virtual Charter School Board, that they disagreed in April 2019. So, Epic implemented a protocol to prohibit students to enroll in Epic that were enrolled in a private school and Epic has been vetting previously enrolled students in Epic that are dual enrolled. Once these students are identified, Epic has provided parents with a reasonable period of time to decide between Epic and the private institution. If the parent opts to stay in the private school, Epic is disenrolling the student even though the student resides in the State of Oklahoma.

21. Admitted.

22. Admitted. Epic has not attempted to inquire as to whether or not the parents or the affected students were using the charter school as a method of generating revenue for students. In further response, Epic states that no public funds received by the school for students enrolled in the school were paid to either any private school or to any student (or parent / guardian of any student).

23. Epic is without sufficient information or knowledge to either admit or deny the allegations in Paragraph 23 of the Petition and therefore denies same.

24. Epic is without sufficient information or knowledge to either admit or deny the allegations in Paragraph 24 of the Petition and therefore denies same.

25. Epic is without sufficient information or knowledge to either admit or deny the allegations in Paragraph 25 of the Petition and therefore denies same.

COUNT 1: Declaratory Judgment

26. No response is required.

27. Admitted.

28. Admitted.

29. Epic is without sufficient information or knowledge to either admit or deny the allegations in Paragraph 29 of the Petition and therefore denies same.

30. Admitted.

COUNT 2: Injunctive Relief

31. No response is required.

32. Epic is without sufficient information or knowledge to either admit or deny the allegations in Paragraph 32 of the Petition and therefore denies same.

33. Epic is without sufficient information or knowledge to either admit or deny the allegations in Paragraph 33 of the Petition and therefore denies same.

34. Epic is without sufficient information or knowledge to either admit or deny the allegations in Paragraph 34 of the Petition and therefore denies same.

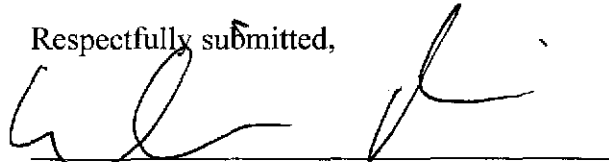
35. Epic is without sufficient information or knowledge to either admit or deny the allegations in Paragraph 35 of the Petition and therefore denies same.

36. Epic is without sufficient information or knowledge to either admit or deny the allegations in Paragraph 36 of the Petition and therefore denies same.

37. Epic is without sufficient information or knowledge to either admit or deny the allegations in Paragraph 37 of the Petition and therefore denies same.

WHEREFORE, Epic respectfully requests the Court consider the issues presented in the Petition in an expedited fashion for the benefit of the students, families and the school and further such further and other relief as the Court may deem appropriate.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'W. H. Hickman', written over a horizontal line.

William H. Hickman, OBA No. 18395

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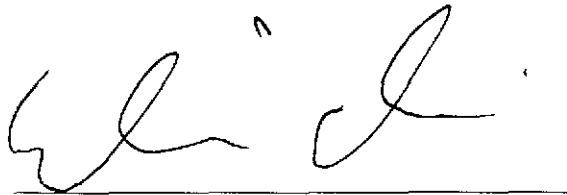
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Attorney for Defendant

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing was mailed and / or e-mailed this 10th day of October 2019, to the following attorneys of record:

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(405) 488-0529 fax
Attorney for Plaintiffs

A handwritten signature in black ink, appearing to read 'W. H. Hickman', written over a horizontal line.

William H. Hickman

WHH\1570\2-6\Pleadings\Answer - Grieb